

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re)	Chapter 15
)	
Crédito Real, S.A.B. de C.V., SOFOM, E.N.R., ¹)	Case No. 22-10630 (JTD)
)	
Debtor in a Foreign Proceeding.)	Objection Deadline: November 10, 2022 at 4:00 p.m. (ET)
)	Hearing Date: To be determined.

NOTICE OF MOTION AND HEARING

PLEASE TAKE NOTICE that, on October 26, 2022, Robert Wagstaff (the “**Foreign Representative**”), in his capacity as duly appointed foreign representative by Mr. Fernando Alonso-de-Florida Rivero, the court-appointed liquidator (*Liquidador Judicial*) (the “**Mexican Liquidator**”) of the Special Expedited Commercial proceeding (*Via Sumaria Especial Mercantil*) for the dissolution and liquidation (the “**Mexican Liquidation Proceeding**”) of Crédito Real, S.A.B. de C.V., SOFOM, E.N.R., (“**Crédito Real**” or the “**Chapter 15 Debtor**” and, together with its affiliates, the “**Company**”) pending in the 52nd Civil State Court of Mexico City (the “**Mexican Court**”) pursuant to, among others, Articles 229, 232, 233, and 236 of the *Ley General de Sociedades Mercantiles* (as amended, the “**Mexican Corporations Law**”) filed the *Foreign Representative’s Motion for Entry of Orders: (I)(A) Authorizing and Approving Bidding Procedures Relating to the Sale of Chapter 15 Debtor’s Equity Interests in Crédito Real USA Finance, LLC, (B) Scheduling an Auction for, and Hearing to Approve, the Proposed Sale, and (C) Approving the Form and Manner of Notice Thereof; (II) Authorizing and Approving the Sale of Chapter 15 Debtor’s Equity Interests in*

¹ The last four identifying digits of the tax number and the jurisdiction in which the Chapter 15 Debtor pays taxes is Mexico – 6815. The Chapter 15 Debtor’s corporate headquarters is located at Avenida Insurgentes Sur No. 730, 20th Floor, Colonia del Valle Norte, Alcaldía Benito Juárez, 03103, Mexico City, Mexico.

Crédito Real USA Finance, LLC Free and Clear of All Liens, Claims, Encumbrances, and Interests; and (III) Granting Related Relief (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

PLEASE TAKE FURTHER NOTICE that, any responses or objections to the Motion must be in writing and filed with the Clerk of the Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801 on or before **November 10, 2022 at 4:00 p.m. (prevailing Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that, if any objections to the Motion are received, the Motion and such objections shall be considered at a hearing before The Honorable Laurie Selber Silverstein, Chief United States Bankruptcy Judge for the District of Delaware, at the Court, 824 North Market Street, 6th Floor, Courtroom No. 2, Wilmington, Delaware 19801 on **a date and time to be determined**. You will receive a separate notice once a hearing has been scheduled.

PLEASE TAKE FURTHER NOTICE THAT, IF NO OBJECTIONS TO THE MOTION ARE TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: October 26, 2022

Respectfully submitted,

/s/ Amanda R. Steele

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